



**BOULT • CUMMINGS
CONNERS • BERRY_{PLC}**

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EXECUTIVE SECRETARY

August 21, 2001

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

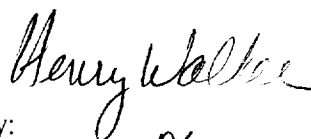
Re: Docket to Establish Generic Performance Measurements,
Benchmarks and Enforcement Mechanisms for BellSouth
Telecommunications, Inc.
Docket No. 01-00193

Dear David:

Please find enclosed the original and thirteen copies of the Comments of Birch Telecom, Inc. inserted into the matrix as requested by the Tennessee Regulatory Authority in the above-captioned proceeding. Please note that Birch supports the comments made by the other CLECs. Copies have been provided to parties.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
nx

Henry Walker

HW/nl
Attachment
c: Parties

Date 8/17/2001

SQM Measures from the TRA Order of August 11, 2000, and later modified by the June 26, 2001 order in Docket 99-00430		Agree or Disagree with Baseline Measure ^{1/}	If disagree, Proposed alternative.
Pre-Ordering OSS			
1. Average Response Time and Response Interval			
2. Interface Availability Regional Level 99.5% for any unscheduled downtime. No			
Ordering			
3. Percent Flow-Through Service Requests (Summary)		Disagree	The benchmarks for all CLEC LSRs that are designed to flow-through should be set at 98%. The measurement already allows BellSouth to exclude LSRs with CLEC errors and LSRs that are not designed to flow-through BellSouth's OSS. With the above exclusions, BellSouth has no rationale for lower UNE or business resale benchmarks.
			BellSouth should also report, on a diagnostic basis, the flow-through of all CLEC LSRs (excluding CLEC errors).
4. Percent Flow-Through Service Requests (Detail)		Disagree	Same as above.
5. Flow-Through Error Analysis			
CLEC LSR Information - LSR Flow-Through Matrix			
6. Percent Rejected Service Requests			
7. Reject Interval Distribution and Average Reject Interval			
8. Reject Interval		Agree	Birch strongly supports the adoption of the Texas standards for Reject Interval.

9. Percent Firm Order Confirmation Returned	Disagree	<p>While Birch supports the standards and underlying intentions of the Texas measurement that was adopted, the measure should be changed to reflect the BellSouth and latest Texas change, that measures the way the order is handled. Specifically, fully mechanized, partially mechanized, and fully manual order types are disaggregated and have separate benchmarks.</p> <p>Birch supports the Texas style benchmarks that the TRA adopted as part of the DeltaCom arbitration. Specifically, keeping the 5-hour standard for partially mechanized is of vital importance (same as the new Texas measurement for partially mechanized I.SRs). The 95% confidence level is also important to ensure the benchmark established has merit.</p>
10. Speed of Answer in Ordering Center		
11. Average Response Time for Loop Make-Up Information Provisioning		
12. Mean Held Order Interval & Distribution Intervals		
13. Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices		
14. Percent Missed Installation Appointments		

15. Average Completion Interval (OCI) & Order Completion Interval Distribution	Disagree	The OCI start time should be modified to reflect the receipt of the complete and accurate CLEC LSR. Currently, the start time is when the order is accepted by SOCS (BellSouth legacy ordering system). The FCC has supported the Birch proposed start time in every approved 271 application (Southwestern Bell and Verizon) and also referenced the Birch proposed start time in numerous denials of BellSouth 271 applications (South Carolina (paragraph 132-140) and Louisiana 1 (paragraph 41) & 2 (paragraph 124)). Specifically in the Louisiana 1 order, the FCC states the average completion interval should start when BellSouth first receives the CLEC LSR.
16. Average Completion Notice Interval		
17. Coordinated Customer Conversions		
18. % Provisioning Troubles w/i 30 days Service Order Activity		
19. Total Service Order Cycle Time (TSOCT)		
20. Percentage of LNP Only Due Dates within Industry Guidelines		
21. Percentage of Time the Old Service provider Releases the Subscription Prior to the Expiration of the Second 9 Hour Timer		
22. Percentage of Customer Accounts Restructured Prior to LNP Due Date		
23. Percentage of Pre-mature Disconnects for LNP Orders		
24. Average Days Required to Process a Request		
25. Percentage of Pre-mature Disconnects (Coordinated Cutovers)		
26. Percentage of Missed Mechanized LNP Conversions		

27. Percent NXX's loaded and tested prior to the LERG effective date			
28. Average Delay Days for NXX Loading and Testing			
Maintenance & Repair			
29. Missed Repair Appointments			
30. Customer Trouble Report Rate			
31. Maintenance Average Duration			
32. Percent Repeat Troubles w/ 30 days)			
33. Out of Service > 24 Hours			
34. OSS Interface Availability			
35. OSS Response Interval and Percentages			
36. Average Answer Time - Repair Centers			
37. Mean Time to Repair			
Billing			
38. Invoice Accuracy			
39. Mean Time to Deliver Invoices			
40. Usage Data Delivery Accuracy			
41. Usage Data Delivery Completeness			
42. Usage Data Delivery Timeliness			
43. Mean Time to Deliver Usage			
44. Percent of Accurate and Complete Formatted Mechanized Bills			
45. Billing Completeness			
46. Unbillable Usage			
Operator Services (Toll) and Directory Assistance			
47. Average Speed to Answer (Toll)			
48. Percent Answered within "X" Seconds (Toll)			
49. Average Speed to Answer (DA)			
50. Percent Answered within "X" Seconds (DA)			
51. Percentage of Updates Completed into the DA Database within 72 hours for Facility Based CLECs			
52. Average Update Interval for DA Database for Facility Based CLECs			
53. Percentage DA Database Accuracy for Manual Updates			
E911			
54. Timeliness			

55. Accuracy			
56. Mean Interval			
Trunk Group Performance			
57. Trunk Group Service Report			
58. Trunk Group Service Detail			
Collocation			
59. Average Response Time			
60. Average Arrangement Time			
61. % of Due Dates Missed			
Bona Fide Requests			
62. Percentage of Requests Processed within 30 Business Days			
63. Percentage of Quotes Provided for Authorized BFRs / Special Requests Processed within X (10, 30, 90) Business Days			
Attach additional proposed measures on a separate sheet.			

/1 Baseline measures for this proceeding are those adopted by the Authority in Docket 99-00430, the BellSouth/ ITC Delacom Arbitration.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via facsimile or hand delivery, to the following on this the 21st day of August, 2001.

Guy Hicks, Esq.
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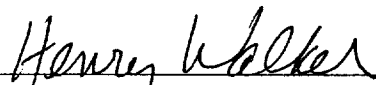
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